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Attorneys for Plaintiffs and Counterclaim Defendants

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FOURTH AGE LIMITED, et al.,

Plaintiffs,

v.

WARNER BROS. DIGITAL
DISTRIBUTION, INC., et al.,

Defendants.

WARNER BROS. DIGITAL
DISTRIBUTION, INC., et al.,

Counterclaim Plaintiffs,

v.

FOURTH AGE LIMITED, et al.,

Counterclaim Defendants.

Case No. CV 12-09912 ABC (SHx)

Hon. Audrey B. Collins
Hon. Stephen J. Hillman

DISCOVERY MATTER

**NOTICE OF MOTION AND
MOTION OF TOLKIEN/HC
PARTIES' TO COMPEL
ZAENTZ AND WARNER TO
PRODUCE SPECIFIED
DOCUMENTS**

[Fed. R. Civ. P. 37(a) and Central
Dist. Local Rule 37-2]

[Joint Stipulation; Declarations of
Rachel Valadez, John C. Ulin and
Victor Jih; and [Proposed] Order filed
and/or lodged concurrently herewith]

Hearing Date: July 28, 2014

Time: 2:00 p.m.

Place: Ctrm. 550, Roybal Building

Action Filed: November 19, 2012

Discovery Cutoff: July 29, 2014

Trial Date, Pretrial Conf. and Motion

Cutoff Date: Vacated

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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on July 28, 2014 at 2:00 p.m., or as soon thereafter as the matter may be heard by the above-entitled court, located at 255 East Temple Street, Los Angeles, California, in Courtroom 550, plaintiffs and counterclaim defendants Fourth Age Limited, Priscilla Mary Anne Reuel Tolkien, as Trustee of The Tolkien Trust, The J.R.R. Tolkien Estate Ltd., HarperCollins Publishers, Ltd., Unwin Hyman Ltd. and George Allen & Unwin (Publishers), Ltd. (collectively, the “Tolkien/HC Parties”) will and hereby do move the Court for an order compelling defendants and counterclaim plaintiffs Warner Bros. Digital Distribution, Inc., Warner Bros. Home Entertainment, Inc., Warner Bros. Consumer Products, Inc., Warner Bros. Interactive Entertainment, Inc., and New Line Productions, Inc. (“Warner”) and The Saul Zaentz Company (“Zaentz,” collectively with Warner, “Defendants”) to produce specified documents in Response to Fourth Age Limited’s Request for Production No. 119.

The Tolkien/HC Parties and Defendants submit the concurrently filed Joint Stipulation Regarding The Tolkien/HC Parties’ Motion to Compel Zaentz and Warner to Produce Specified Documents pursuant to Federal Rules of Civil Procedure 26, 34, and 37, and Central District Local Rules 37-2 and 37-1. Pursuant to Central District Local Rule 37-1, the Tolkien/HC Parties and Defendants have attempted unsuccessfully to resolve their disputes and therefore respectfully seek the assistance of the Court.

DATED: July 7, 2014

GREENBERG GLUSKER FIELDS
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By: /s/ Bonnie E. Eskenazi
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